

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Pro-Mark Services Inc.,

Debtor.

Case No.: 24-30167
Chapter 7

APPLICATION FOR APPROVAL OF EMPLOYMENT OF AUCTIONEER

1. Applicant is the trustee in this case.
2. Applicant applies for approval of the employment of Jeff Martin Auctioneers, Inc. as agent to recover and sell the following property:
 - 2023 Ford F350 Super Duty Truck VIN 1FT8W3BT3PEC56799;
 - 2022 Ford F350 Lariat, VIN 1FT8W3BT4NEF29410;
 - 2019 Ford F550 Crew, VIN 1FD0W5HT4KEF69820;
 - 2018 Ford F-350 Super Duty, VIN 1FT8W3BTXJEB96589;
 - 2015 Ford F-350 Super Duty, VIN 1FT8W3BT6FEC35878;
 - 2013 Ford F-550 Crew, VIN 1FD0W5HT2DEB64235;
 - 2003 Chevy K2500 HD Silverado, VIN 1GCHK231X3F145674; and
3. The terms and conditions of compensation and reimbursement of expenses are as follows: Said agent to be paid 8% of gross sales, \$450 per unit for transport from Fergus Falls, \$700 per unit transported from Minot, North Dakota. There is a \$100 no sale or buy back fee for items not sold in auction.
4. Said professional has disclosed to the undersigned that he has the following connections with the debtors, creditors, and other parties-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee: None.
5. Trustee has verified that the auctioneer is bonded and maintains insurance for lost or stolen property.
6. Trustee and auctioneer agree that auction proceeds shall be turned over to the trustee within thirty (30) days of the completion of the auction.

7. The trustee has asked the applicants to begin work immediately to expedite its work and to more efficiently use the time the applicants and Trustee have spent on this case making the initial analysis. Therefore, the trustee respectfully requests that the employment be authorized effective on the date of this application and that the auctioneer's compensation and costs be paid from the gross auction proceeds.

WHEREFORE, Applicant requests that the Bankruptcy Court approve such employment by the Trustee.

Dated: November 18, 2024

/s/ Erik A. Ahlgren
Erik A. Ahlgren, Trustee
220 W. Washington Ave. Suite 105
Fergus Falls MN 56537

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VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)

I, Peter Gehres, the professional named in the application for employment on behalf of the above named bankruptcy estate, declares under penalty of perjury the following:

1. I do not hold or represent any interest adverse to the estate and am disinterested as required by 11 U.S.C. § 327.
2. I do not have any connections to the debtor, creditors, any other party-in-interest, their respective attorneys and accountants, the United State trustee, or any person employed in the offices of the United States Trustee, except for the following:
None

Dated: 11/15/24



Peter Gehres, COO
Jeff Martin Auctioneers, Inc.
2236 Highway 49
Brooklyn, MS 39425
1-844-450-6200

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NOTICE OF APPLICATION FOR APPROVAL OF EMPLOYMENT OF
AUCTIONEER

The Trustee filed and served an Application for Approval of Employment of Auctioneer dated November 18, 2024. Your rights may be affected in the action. You should read the papers carefully and discuss the matters with your attorney if you have one. If you want the court to consider your views you should mail a written response to the action, within 14 days of the date of mailing of this document, and file the response with the Clerk of Bankruptcy Court and a copy served upon the U.S. Trustee and Bankruptcy Trustee.

Clerk, U.S. Bankruptcy Court
Quentin N Burdick U.S.
Courthouse
655 First Ave N – Ste 210
Fargo ND 58107-4932

United States Trustee
314 S Main Ave.
Suite 303
Sioux Falls SD 57104-
6462

Trustee
(See address below)

DATE OF MAILING: November 18, 2024

/s/ Erik Ahlgren
Erik Ahlgren, Chapter Trustee
Ahlgren Law Office, PLLC
220 W Washington Ave. Ste 105
Fergus Falls MN 56537
218-998-2775

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UNSWORN CERTIFICATE OF SERVICE

I, Lisa Ahlgren, declare under penalty of perjury that on November 18, 2024 that those entities requesting electronic notification were served electronically via CM/ECF

Connor Cantrell on behalf of Creditor Hartford Accident and Indemnity Company
clc@thlf.com, jlh@thlf.com

Jordan Elizabeth Chavez on behalf of Interested Party BAD Investments LLP
jordan.chavez@haynesboone.com

Jordan Elizabeth Chavez on behalf of Interested Party Connie Berg jordan.chavez@haynesboone.com

Jordan Elizabeth Chavez on behalf of Interested Party Kyle Berg jordan.chavez@haynesboone.com

GENE W. DOELING on behalf of Debtor Pro-Mark Services, Inc.

gene@kaler-doeling.com, heather@kaler-doeling.com, mn20@ecfbis.com

Patrick Hustead on behalf of Creditor Hartford Accident and Indemnity Company rah@thlf.com,
jlh@thlf.com

Steven R Kinsella on behalf of Interested Party Razor Consulting Solutions skinsella@fredlaw.com,
stallings@fredlaw.com; autodockets@fredlaw.com

Stephen M. Pezanosky on behalf of Interested Party BAD Investments LLP

stephen.pezanosky@haynesboone.com, kim.morzak@haynesboone.com; jordan.chavez@haynesboone.com

Stephen M. Pezanosky on behalf of Interested Party Connie Berg

stephen.pezanosky@haynesboone.com, kim.morzak@haynesboone.com; jordan.chavez@haynesboone.com

Stephen M. Pezanosky on behalf of Interested Party Kyle Berg

stephen.pezanosky@haynesboone.com, kim.morzak@haynesboone.com; jordan.chavez@haynesboone.com

Robert B. Raschke USTPRegion12.SX.ECF@usdoj.gov

Michael Lewis Scheier on behalf of Appraiser Prudent Fiduciary Services mscheier@kmklaw.com

Michael Lewis Scheier on behalf of Appraiser Miguel Paredes mscheier@kmklaw.com

Caren W. Stanley on behalf of Creditor Capital Credit Union

cstanley@vogellaw.com, jnona@vogellaw.com; sthompson@vogellaw.com; jschares@vogellaw.com

Katrina A. Turman Lang on behalf of Creditor Right Choice Electric, Inc.

klang@woldlaw.com, melanie@turmanlaw.com

Executed on: November 18, 2024

Signed: /s/ Lisa. Ahlgren

Lisa Ahlgren
220 W. Washington Ave. Ste 105
Fergus Falls MN 56537